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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

MICHAEL JOSEPH FOWLER,	)	Case No.: 2:24-cv-03550-DMC
Plaintiff,	)	STIPULATION AND ORDER FOR AN
vs.	)	EXTENSION OF TIME
COMMISSIONER OF SOCIAL SECURITY,	)	
Defendant.	)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended eleven (11) days from May 1, 2025, up to and including May 12, 2025. This is the Defendant's first extension request.

Defendant's counsel was recently assigned this case along with several other cases, and now has four cases due on May 1, 2025. Defendant requests this extension in order to review the record; evaluate the issues raised in Plaintiff's brief; determine whether options exist for settlement; and if not, to prepare Defendant's response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as possible. This request is made in good

1 faith and with no intention to unduly delay the proceedings, and counsel apologizes for any  
2 inconvenience.

3 The parties further stipulate that the Court's Scheduling Order shall be modified  
4 accordingly.

5 Respectfully submitted,

6 LAW OFFICES OF FRANCESCO BENAVIDES

7 Dated: April 11, 2025

/s/ Francesco Benavides\*

8 (\*as authorized via e-mail)

9 FRANCESCO BENAVIDES

Attorney for Plaintiff

10 Dated: April 11, 2025

MICHELE BECKWITH

11 Acting United States Attorney

MATHEW W. PILE

12 Associate General Counsel

13 Social Security Administration

14 By: /s/ Michelle A. Pavelek

MICHELLE A. PAVELEK

15 Special Assistant U.S. Attorney

16 Attorneys for Defendant

17  
18 **ORDER**

19 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an  
20 extension, up to and including May 12, 2025, to respond to Plaintiff's Brief and Plaintiff's  
21 optional reply brief will be extended to May 26, 2025.

22  
23 Dated: April 11, 2025

24 

25 DENNIS M. COTA

26 UNITED STATES MAGISTRATE JUDGE